

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
)
) Case no. 01-01139 (JKF)
W.R. GRACE & CO., *et al.*,) Jointly Administered
)
Debtors)

DECLARATION OF GINA G. WASHBURN

I, Gina G. Washburn, hereby declare and testify under penalty of perjury as follows:

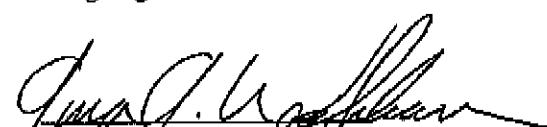
1. I am a Senior Project Administrator for Rust Consulting, Inc. ("Rust"). Rust is the claims processing agent appointed by this Court in the above-captioned bankruptcy, *In re W.R. Grace et al.*, Case No. 01-1139 (JKF) (Bankr. D. Del.).
2. As the Senior Project Administrator assigned to this case, I am responsible for managing and overseeing the process of compiling the information collected from the W.R. Grace Asbestos Personal Injury Questionnaires into a navigable database.
3. To date, approximately 56,659 Personal Injury Questionnaires, PIQs, have been returned to Rust. Of that number, Rust has observed that there is a significant number of PIQ's for which the person completing the PIQ has not filled in the information requested by a particular question or section. Instead, the respondent has indicated that the answer is contained in one of the attachments to the PIQ. On average, there are approximately 38.43 pages of attachments per PIQ.



4. Providing a response to the PIQ in this manner makes it impossible to effectively or efficiently compile the information into a navigable database. A data entry clerk who keys information from the PIQ does not determine what information contained in an attachment answers a specific question or section of the PIQ. The effect of attaching documents in lieu of completing the answer results in an absence of any data being entered into the database.

5. If answers to the PIQs are allowed to be provided in this manner, Rust will be unable to meet the September 12, 2006 deadline for completing the compilation of the information contained in the PIQ responses into a navigable database. When Rust provided its estimate of the time required to construct a navigable database, Rust believed that the claimants would be required to provide their answers in the Questionnaire itself.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 17, 2006.



Gina G. Washburn
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